

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Richard P. Krasnow

Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
	:
-----X	

**NOTICE OF SECOND SUPPLEMENTAL  
DECLARATION AND DISCLOSURE STATEMENT OF  
GLJS VAN LEEUWEN ON BEHALF OF NORTON ROSE LLP**

**PLEASE TAKE NOTICE** that on November 20, 2008, and in accordance with the Order Pursuant to Sections 105(a), 327, 328 and 330 of the Bankruptcy Code Authorizing the Debtors to Employ Professionals Utilized in the Ordinary Course of Business, entered on November 5, 2008 (the "Order") [Docket. No. 1394], Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors"), filed the ordinary course professional affidavit and retention questionnaire (together the "Affidavit and Questionnaire" of Peter Snowden on behalf of Norton Rose LLP ("Norton Rose") [Docket No. 1613]. A supplement to the Affidavit and Questionnaire was filed on May 5, 2009 [Docket No. 3483].

**PLEASE TAKE FURTHER NOTICE** that the Order was Amended on March 25, 2010 (the "Amended Order") [Docket No. 7822].

**PLEASE TAKE FURTHER NOTICE** that Norton Rose hereby further supplements its Affidavit and Questionnaire to include providing legal advice to the Debtors with respect to certain legal issues under Dutch law (the “Supplemental Norton Rose Declaration”). A copy of the Supplemental Norton Rose Declaration is attached hereto as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Amended Order, the Debtors will serve this Notice, together with the Supplemental Norton Rose Declaration, on (i) the Office of the United States Trustee, and (ii) the attorneys for the Official Committee of Unsecured Creditors appointed in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Amended Order, objections, if any, to the expanded retention of Norton Rose must be filed with the Court and served upon the undersigned attorney for the Debtors within 10 days of the date of service of this Notice. Unless timely objections are received, the expanded retention of Norton Rose shall be deemed approved by the Court and deemed to be ordinary course professionals within the purview of the Amended Order, without the necessity of a hearing.

Dated: May 12, 2010  
New York, New York

/s/ Richard P. Krasnow  
Richard P. Krasnow  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:
	:
<b>Debtors.</b>	:
	:
	:
-----X	

**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**SECOND SUPPLEMENTAL DECLARATION AND DISCLOSURE STATEMENT OF  
Gijs van Leeuwen,**

**ON BEHALF OF NORTON ROSE LLP**


GIJSBERT VAN LEEUWEN declares and says:

1. I am a member of Norton Rose LLP, located at Amstelplein 1, 1096 HA Amsterdam, the Netherlands (the "Firm").
2. On November 18, 2008, PETER SNOWDON executed an affidavit and disclosure statement (the "Affidavit") in support of Lehman Brothers Holdings Inc. and its affiliated debtors (together, the "Debtors") retention of the Firm as ordinary course professionals and submitted that Affidavit and a completed retention questionnaire (the "Questionnaire") to the Debtors' bankruptcy counsel, to be filed with the Court in accordance with the procedures set forth in the order entered November 5, 2008 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 1394]. The Debtors subsequently filed the Affidavit and Questionnaire with the Court on November 20, 2008 [Docket No. 1613].
3. On May 5, 2009, the Debtors filed a Supplemental Affidavit and Disclosure Statement of Peter Snowden on behalf of Norton Rose LLP [Docket No. 3483] (the "Supplemental Affidavit"). Pursuant to the Supplemental Affidavit, the Firm expanded the

scope of services provided to the Debtors to include regulatory advice which may consist of filing applications with the United Kingdom Financial Services Authority.

4. This affidavit further supplements the Affidavit and Questionnaire, by supplementing the response to question 4 of the Questionnaire, which asks for a brief description of the services to be provided. The response is hereby supplemented to include providing legal advice to the Debtors with respect to certain legal issues under Dutch law.

Dated: Amsterdam, the Netherlands  
11 May, 2010



G.C.L. van Leeuwen